

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

SYNGENTA CROP PROTECTION, LLC,

Plaintiff,

v.

WILLOWOOD, LLC, WILLOWOOD USA,
LLC, WILLOWOOD AZOXYSTROBIN,
LLC, and WILLOWOOD LIMITED,

Defendants.

Civil Action No: 1:15-CV-274

**PLAINTIFF SYNGENTA CROP PROTECTION, LLC'S
PRETRIAL DISCLOSURES**

Pursuant to Federal Rule of Civil Procedure 26(a)(3) and Local Rule 40.1, Plaintiff Syngenta Crop Protection, LLC (hereinafter "Syngenta") submits the following pretrial disclosures:

- Exhibit A:** List of witnesses that Syngenta expects to present and those it may call if the need arises;
- Exhibit B:** List of witnesses whose testimony Syngenta expects to present at trial by means of a deposition; and
- Exhibit C:** List of exhibits that Syngenta expects to present at trial or those that it may present if the need arises.

Dated: June 1, 2017

By: /s/Richard A. Coughlin

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EXHIBIT A

In addition to those potential witnesses identified herein, Syngenta reserves the right to call any witness identified by Defendants. Syngenta also reserves the right to call any witnesses as may be necessary to authenticate evidence, or to rebut or impeach testimony or other evidence presented by Defendants. Subject to and without waiver of the foregoing, Syngenta identifies the following witnesses that it expects to call at trial and those that may call if the need arises:

I. Witnesses Whom Syngenta Expects to Call

1. Jeff Cecil
2. Andrew Fisher
3. Joseph Fortunak, Ph.D
4. Brian Heinze, Willowood USA, LLC
5. Alan Whitton , Ph.D
6. Rex Wichert, Ph.D
7. Benjamin Wilner, Ph.D

II. Witnesses Whom Syngenta May Call Live or by Deposition If the Need Arises

1. Victoria Bublyk
2. Adora Clark, Ph.D
3. Christopher Hayden
4. Joseph Middione, Willowood USA, LLC
5. Vijay Mundhra, Willowood Limited
6. Shen Shaojun, Willowood Limited

EXHIBIT B

Syngenta also reserves the right to present any portion of a deposition as may be necessary to rebut or impeach testimony or other evidence presented by live witnesses. Syngenta also reserves the right to designate additional depositions if a witness listed becomes unavailable. Subject to and without waiver of the foregoing, Syngenta may present through deposition designations the testimony of the following witnesses, including all or portions of the following identified excerpts:

Witness	Date of Deposition	Transcript Portions Designated by Syngenta
Brad Reichman	July 25, 2016	4:14-8:5, 7:23-9:24, 33:14-35:6, 51:4-52:8, 53:6-57:4, 57:9-21, 58:14-71:19, 73:14-79:3, 79:15-83:22, 88:15-91:7, 113:8-115:2.
Joseph Middione	July 26, 2016	7:13-8:18, 14:6-16:1, 75:12-77:14, 82:1-87:19, 95:14-96:21, 96:22-98:11, 104:9-105:10, 111:15-115:9, 115:17-116:22, 117:14-118:3, 127:6-130:6, 132:19-22, 139:1-140:14, 140:15-143:6, 143:11-144:13, 150:8-158:22, 159:1-162:18, 167:7-169:7, 169:8-182:7, 193:13-198:13, 198:15-203:5
Shen Shaojun	August 23, 2016	16:15-17:21, 20:1-21, 30:7-31:2, 32:16-34:20, 34:22-35:22, 37:6-42:12, 43:3-10, 44:14-47:13, 48:9-49:17, 70:11-71:16, 73:9-15, 74:21-75:1, 76:6-77:11, 79:5-83:13
Vijay Mundhra	August 23, 2016	34:3-39:17, 54:12-58:2, 61:15-63:13, 63:22-64:11, 65:13-66:7, 103:8-113:10, 127:1-130:13, 133:14-135:20, 138:12-139:20, 150:9-165:8, 171:4-13
Wu Xialong	August 31, 2016	5:8-6:13, 26:22-27:4, 27:20-33:16, 43:14-45, 45:13-65:14, 67:16-68:7, 71:24-72:12, 73:24-74:3, 86:11-88:4, 88:7-89:22, 90:2-91:7, 92:2-94:2, 94:14-96:1

EXHIBIT C

Syngenta identifies the following items for possible presentation at trial only to the extent that the exhibit or some portion thereof is admissible pursuant to the Federal Rules of Evidence. By listing these items herein, Syngenta does not admit their relevance or admissibility in this proceeding, and Syngenta reserves the right to object to the admission of any of these items, or at least parts thereof. Syngenta reserves the right to present any item identified on Defendants' exhibit list, whether or not Defendants offer the item at trial. Syngenta also expressly reserves the right to offer or otherwise use at trial any document or other exhibit discovered or disclosed after the date of these disclosures, and any document or exhibit necessary to rebut or respond to any evidence offered by another party.

I. Exhibits that Syngenta Expects to Offer at Trial, Other Than Those that May Be Used Solely for the Purposes of Cross-Examination or Impeachment

Ex. No.	Description	Confidentiality Designation¹	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.²
1	Certified copy of U.S. Patent No. 5,602,076	Not Confidential			
2	Certified copy of U.S. Patent No. 5,633,256	Not Confidential			
3	Certified copy of U.S. Patent No. 5,847,138	Not Confidential			
4	Certified copy of U.S. Patent No. 8,124,761	Not Confidential			

¹ "SYN AEO" and WW AEO" refer to documents that Syngenta and Willowood have designated, respectively, as attorneys' eye only subject to the protective order.

² Syngenta has indicated whether particular exhibits were previously used as deposition exhibits or filed with this Court.

Ex. No.	Description	Confidentiality Designation¹	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.²
5	Curriculum Vitae of Dr. Joseph Fortunak (Appx. A to Fortunak Report)	Not Confidential			
6.a	Syngenta DABCO Testing Protocol	SYN AEO	SYN284073	SYN284083	
6.b	Syngenta DABCO Testing Results (Part 1)	SYN AEO	SYN010181	SYN010189	
6.c	Syngenta DABCO Testing Results (Part 2)	SYN AEO	SYN284084	SYN284101	
6.d	Syngenta DABCO Testing Results (Part 3)	SYN AEO	SYN287769	SYN287816	
7	Email from V. Mundhra to B. Heinze re DABCO content in Azoxystrobin samples	Not Confidential	WW022213	WW022221	Fortunak 03; Dkt. 99-10
8	Tai He Process Document	Not Confidential	WW0000017	WW0000026	PDX 63
9	EPA Process Submission	Not Confidential	WW019062	WW0190193	
10	U.S. Patent Application Pub. No. 2003/0092723 (Weintritt)	Not Confidential			Dkt. 96-34
11	Certified copy of File History of U.S. Patent No. 8,124,761	Not Confidential			
12	Intra-Willowood Requirements Purchase Agreement	WW AEO	WW000001	WW000004	
13	First Amendment to Intra-Willowood Requirements Purchase Agreement	WW AEO	WW000005	WW000006	
14	Intra-Willowood Supply Agreement	WW AEO	WW000007	WW0000012	
15	Willowood-TaiHe Supply Agreement	WW AEO	WW0000013	WW0000016	
16	Invoices from W-Ltd to W-USA for Azoxystrobin Technical	WW AEO	WW000042	WW000053	Heinze 39
17.a	Print out of W-Ltd. Website - Home Page (Not Annotated)	Not Confidential			

Ex. No.	Description	Confidentiality Designation¹	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.²
17.b	Print out of W-Ltd. Website - Home Page (Annotated)	Not Confidential			Dkt. 22-1
17.c	Print out of W-Ltd. Website - About Us Page (Not Annotated)	Not Confidential			
17.d	Print out of W-Ltd. Website - About Us Page (Annotated)	Not Confidential			Dkt. 22-2
17.e	Print out of W-Ltd. Website - Worldwide Offices Page (Not Annotated)	Not Confidential			
17.f	Print out of W-Ltd. Website - Worldwide Offices Page (Annotated)	Not Confidential			Dkt. 22-8
17.g	Print out of W-Ltd. Website - W-USA Page (Not Annotated)	Not Confidential			
17.h	Print out of W-Ltd. Website - W-USA Page Offices Page (Annotated)	Not Confidential			Dkt. 22-9
17.i	Print out of W-USA Website - About Us Page (Not Annotated)	Not Confidential			
17.j	Print out of W-USA Website - About Us Page Offices Page (Annotated)	Not Confidential			Dkt. 22-10
17.k	Print out of W-USA Website - Meet the Team Page (Not Annotated)	Not Confidential			
17.l	Print out of W-USA Website - Meet the Team Page (Annotated)	Not Confidential			Dkt. 22-11
18	Feb. 1, 2010 Press Release re Formation of W-USA	Not Confidential			Dkt. 22-3
19	Email from B. Heinze to A. Stewart enclosing document re TaiHe Azoxystrobin manufacturing process	WW AEO	WW026288	WW026297	Hayden 10
20	Email from C. Hayden to B. Heinze et al. re patent issues and Azoxystrobin manufacturing process, enclosing documents re same	WW AEO	WW026238	WW026250	Hayden 15

Ex. No.	Description	Confidentiality Designation¹	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.²
21	Email from M. Vijay to C. Hayden et al. enclosing photos of factories	WW AEO	WW026332	WW026343	Hayden 16
22	Email from C. Hayden to B. Heinze et al. re TaiHe Azoxystrobin manufacturing steps	WW AEO	WW026251	WW026254	Hayden 17
23	Email from C. Hayden to P. Davis et al. re update of Azoxystrobin opinion to reflect Federal Circuit 2015 case law	WW AEO	WW026362	WW026362	Hayden 18
24	Email from B. Heinze to V. Mundhra re Azoxy patent; 3rd parties and manufacturing process	WW AEO	WW026302	WW026304	Heinze 64
25	Email from V. Mundhra to B. Heinze et al. re Azoxy patent and documentation of manufacturing process	WW AEO	WW026320	WW026326	Heinze 65
26	Email from B. Heinze to A. King et al. re Azoxystrobin manufacturing process; patent attorney	WW AEO	WW026370	WW026370	Heinze 66
27	Email from V. Mundhra to SSJ et al. re TaiHe Azoxystrobin manufacturing process	WW AEO	WW026363	WW026369	Heinze 67
28	Email from V. Mundhra to B. Heinze re Azoxystrobin manufacturing process	WW AEO	WW026371	WW026377	Heinze 68
29	Email from V. Mundhra to SSJ et al. re Azoxy patent; 3rd parties and manufacturing process	WW AEO	WW026298	WW026301	Mundhra 76
30	Email from Sophia to V. Mundhra et al., enclosing document re TaiHe Azoxystrobin manufacturing process	WW AEO	WW022176	WW022184	Mundhra 77
31	Email from V. Mundhra to B. Heinze et al. re Azoxystrobin; chemical zones; written opinions needed	WW AEO	WW026344	WW026348	Shaojun 74
32	Email from V. Mundhra to SSJ et al. re Azoxystrobin manufacturing process	WW AEO	WW026353	WW026359	Shaojun 75
33	Safety Data Sheet - Willowood Azoxystrobin Technical	WW AEO	WW007367	WW007376	Heinze 36

Ex. No.	Description	Confidentiality Designation¹	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.²
34	Email from J. Firkins to B. Heinze et al. re SDS - Azoxy, Clom, Gluf Technicals	WW AEO	WW006203	WW006221	Heinze 37
35	Willowood USA Azoxypop Xtra label	WW AEO	WW021017	WW021043	Heinze 38
36	Willowood Limited Invoice for Willowood Azoxystrobin, LLC	WW AEO	WW001996	WW001997	Heinze 40
37	Air Turnover Order Freight Release for primary importer Willowood Azoxystrobin, LLC	WW AEO	WW003277	WW003277	Heinze 41
38	Email from B. Heinze to V. Mundhra et al. re importation of azoxystrobin; lost profits	WW AEO	WW026416	WW026418	Heinze 71
39	Email chain among Willowood employees re attempt to find manufacturer using alternative process	Not Confidential	WG00000032	WG00000032	Dk. 99-18
40	Email from J. Middione to B. Heinze et al. re Azoxy 2SC label referencing Syngenta	Not Confidential	WW008738	WW008739	Middione 34; Dkt. 110-10
41	Email from SSJ to Rajesh et al. re Azoxystrobin Manufacturing Process	PYX AEO	PYX006426	PYX006430	
42	Email from A. Tillman to C. Hayden re Azoxystrobin Technical	PYX AEO	PYX006444	PYX006446	
43	Email from B. Heinze to Rajesh re Azoxystrobin Manufacturing Process	PYX AEO	PYX006447	PYX006465	
44	Email from A. Tillman to B. Heinze re Azoxystrobin Manufacturing Process	PYX AEO	PYX006466	PYX006469	
45	Letter from R. Levine to B. Heinze re potential infringement of U.S. Patent Nos. 5,602,076 and 5,633,256	Not Confidential	SYN 279607	SYN 279608	Hayden 03
46	Letter from B. Heinze to R. Levine denying patent infringement; denying product in Pasco, Washington	Not Confidential	SYN 279609	SYN 279609	Hayden 04

Ex. No.	Description	Confidentiality Designation¹	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.²
47	Letter from R. Levine to B. Heinze re Azoxystrobin process patents; requesting manufacturing specifications of imported Azoxystrobin	Not Confidential	SYN 279610	SYN 279611	Hayden 05
48	Letter from C. Hayden to R. Levine, denying Willowood's patent infringements and asserting entitlement to trade secrets	Not Confidential	SYN 279612	SYN 279612	Hayden 07
49	Letter from R. Levine to C. Hayden, enclosing a draft confidentiality agreement	Not Confidential	SYN 279613	SYN 279618	Hayden 08
50	Highlighted copy of Willowood's Azoxy 2SC Label (Revised 04-23-2014)	Not Confidential			Dkt. 110-7
51	Highlighted copy of Willowood's AzoxyProp Xtra Label (Revised 08-04-2014)	Not Confidential			Dkt. 110-8
52	Willowood Azoxy 2SC label submitted to EPA (Revised 4-23-2014)	Not Confidential			Dkt. 1-25
53	Willowood USA - Management Presentation	Not Confidential	WW026430	WW026508	Heinze 42
54	Email from B. Heinze to V. Mundhra et al. re air shipments of Azoxystrobin	Not Confidential	WW003071	WW003074	Mundhra 78
55	Email from J. Middione to A. King re Azoxystrobin Shipment	Not Confidential	WW008930	WW008939	Mundhra 79
56	Email from B. Heinze to V. Mundhra et al. re air shipment Azoxy to U.S.; 220A air shipment documents	WW AEO	WW019926	WW019936	Mundhra 80
57	Email from V. Mundhra to B. Heinze et al. re fall Azoxy run; pricing	Not Confidential	WW011039	WW011045	Mundhra 81
58	Email from V. Mundhra to B. Heinze et al. re Weekly Report U.S. OXY delay; explosion in Chinese warehouse; miscommunication	WW AEO	WW014004	WW014010	Mundhra 82
59	12/23/2013 B. Heinze Email re getting partners lined up for azoxystrobin business	Not Confidential	WW025053	WW025053	Dkt. 164-17

Ex. No.	Description	Confidentiality Designation¹	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.²
60	Curriculum Vitae of Dr. Benjamin Wilner (Ex. 2 to Report)	Not Confidential			Wilner 01
61	Dr. Benjamin Wilner's Damages Calculations Relating to Patent Claims as Reflected in the Exhibits to his 8/19/2016 Expert Report	WW AEO SYN AEO			
62	Email from J. Middione to M. Heinze et al. re Azoxy Prop Xtra, enclosing 2015 Pricing Matrix (Attachment does not have a bates number)	WW AEO	WW010082	WW010083	Middione 32
63	Collection of emails from M. Heinze to various clients re Willowood Azoxy 2SC price change	Not Confidential	WW014576	WW014654	Heinze 43
64	Collection of emails from M. Heinze to clients re Willowood AzoxyProp Xtra price decrease	Not Confidential	WW014663	WW014143	Heinze 44
65	Email from M. Heinze to J. Middione re Azoxy pricing	Not Confidential	WW012693	WW012693	Heinze 48
66	Email from J. Middione to B. Heinze et al. re AzoxyProp prices per pallet	Not Confidential	WW010580	WW010585	Heinze 58
67	Email from B. Heinze to J. Middione et al. re pricing of Azoxystrobin Technical and delivery	WWAEO	WW008810	WW008811	Heinze 59
68	Email from A. Fisher to E. Tedford re Competitive Fungicides - Help!	SYN AEO	SYN056311	SYN056312	
69	SC16006 - Total US Ag Fungicide Market	SYN AEO	SYN291271	SYN291271	
70	Azoxystrobin Strategy Summary	SYN AEO	SYN 283441	SYN 283462	Cecil 01
71	Manufacturer List to Grower Price Flow and AZT U.S. Product Marketing Plan	SYN AEO	SYN 056120	SYN 056141	Cecil 20
72	2016 Pricing Guidance - US Fungicides	SYN AEO	SYN 037154	SYN 037174	Cecil 23

Ex. No.	Description	Confidentiality Designation¹	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.²
73	Aframe (Quadris Fighting Brand) Aframe Plus (Quilt Xcel Fighting Brand)	SYN AEO	SYN 283503	SYN 283511	Fisher 03

II. Exhibits that Syngenta May Offer at Trial If the Need Arises

Ex. No.	Description	Confidentiality Designation ³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No. ⁴
74	W-USA, W-LLC, and W-Azoxy Answer to Complaint	Not Confidential			Dkt. 12
75	W-Ltd Answer to Complaint	Not Confidential			Dkt. 33
76	3/15/2016 Willowood's First Supplemental Non-Infringement Contention and Invalidity Contentions	Not Confidential			Lipton 89
77	6/27/2016 Willowood's Second Supplemental Non-Infringement Contention and Invalidity Contentions	Not Confidential			
78	July 29, 2016 Willowood's Response to Syngenta's First Set of Requests for Admission	Not Confidential			
79	9/12/2016 Expert Report of Dr. Joseph Fortunak, including all referenced appendices, exhibits, and documents	Not Confidential			
80	8/19/2016 Expert Report of Dr. Benjamin Wilner, including all referenced appendices, exhibits, and documents	SYN AEO WW AEO			
81	Second Supplemental Appx. B to Expert Report of Dr. Joseph Fortunak, Material Considered	Not Confidential			
82	Appx. C to 8/19/2016 Expert Report of Dr. Joseph Fortunak, SciFinder Search	Not Confidential			

³ "SYN AEO," "WW AEO," and "3rd Party AEO" refer to documents that Syngenta, Willowood, or a third party have designated, respectively, as attorneys' eye only subject to the protective order.

⁴ Syngenta has indicated whether particular exhibits were previously used as deposition exhibits or filed with this Court.

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
83	Appx. D to 8/19/2016 Expert Report of Dr. Joseph Fortunak, Analysis of Syngenta Testing	Not Confidential			
84	Ex. 1 to Wilner Report, Material Considered	SYN AEO			
85	Ex. 3 to Wilner Report, Syngenta Azoxystrobin Brands by Year	Not Confidential			
86	Ex. 4 to Wilner Report, US AG Fungicide Market Share, Excluding Seed Care	Not Confidential			
87	Ex. 5 to Wilner Report, Willowood Monthly Sales Data Summary	WW AEO			
88	Ex. 6 to Wilner Report, Summary of Syngenta AZ Products-at-Issue Actual Net Sales and Gross Profits	SYN AEO			
89	Ex. 7 to Wilner Report, Summary of Syngenta AZ Products-at-Issue Budgeted Net Sales and Gross Profits	SYN AEO			
90	Ex. 8 to Wilner Report, US Price by Crop v. Farm Income for 2012-2016	Not Confidential			
91	Ex. 9.a of Wilner Report, Summary of Syngenta Lost Profit Damages, Assuming Infringement of the '076 and '256 Patents	Not Confidential			
92	Ex. 9.b to 9.d of Wilner Report, Analysis of Syngenta Lost Profit Damages, Assuming Infringement of the '076 and '256 Patents	SYN AEO			
93	Ex. 9.e of Wilner Report, AZ Products-at-Issue: "But For" vs. Actual Incremental Profits, Assuming Infringement of the '076 and '256 Patents	SYN AEO			

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
94	Ex. 10.a to 10.c of Wilner Report, Summary of Syngenta Lost Profit Damages, Assuming Infringement of the '076 and '256 Patents, Excluding Losses Potentially Due to Cheminova	Not Confidential			
95	Ex. 11.a to Wilner Report, Summary of Syngenta Lost Profit Damages, Assuming Infringement of the '138 Patent	Not Confidential			
96	Ex. 11.b to 11.d Wilner Report, Analysis of Syngenta Lost Profit Damages, Assuming Infringement of the '138 Patent	SYN AEO			
97	Ex. 11.e, Analysis of Syngenta Lost Profit Damages, AZ Products-at-Issue: "But For" vs. Actual Incremental Profits, Assuming Infringement of the '138 Patent	SYN AEO			
98	Ex. 12.a to 12.c of Wilner Report, Summary of Syngenta Lost Profit Damages, Assuming Infringement of the '138 Patent, Excluding Losses Potentially Due to Cheminova	Not Confidential			
99	Ex. 13.a to Wilner Report, Summary of Syngenta Lost Profit Damages, Assuming Infringement of the '761 Patent	Not Confidential			
100	Ex. 13.b to 13.d Wilner Report, Analysis of Syngenta Lost Profit Damages, Assuming Infringement of the '761 Patent	SYN AEO			
101	Ex. 13.e, Analysis of Syngenta Lost Profit Damages, AZ Products-at-Issue: "But For" vs. Actual Incremental Profits, Assuming Infringement of the '761 Patent	SYN AEO			

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
102	Ex. 14.a to 14.c of Wilner Report, Summary of Syngenta Lost Profit Damages, Assuming Infringement of the '761 Patent, Excluding Losses Potentially Due to Cheminova	Not Confidential			
103	Ex. 16.b of Wilner Report, Damages Summary by Year - Without Prejudgment Interest	Not Confidential			
104	Ex. 17.b of Wilner Report, Damages Summary by Year - Without Prejudgment Interest, Excluding Losses Potentially Due to Cheminova	Not Confidential			
105	08/19/2016 Expert Report of Dr. Mark Lipton and Referenced Exhibits	Not confidential			Dkt. 96-3
106	09/12/2016 Expert Report of Dr. Mark Lipton and Referenced Exhibits	Not confidential			Dkt. 99-2
107	09/12/2016 Expert Report of John Jarosz and Referenced Exhibits	SYN AEO, WW AEO			Jarosz 85
108	Supplemental Expert Report of J. Jarosz and Referenced Exhibits	SYN AEO			Jarosz 86
109	Product Safety Labs Study titled, "Azoxystrobin 96% Technical: Characterization of Active Ingredient in a Sample of Test Substance"	Not confidential			Fortunak 09
110	2014-01 Gross to Net LP.xlsx	SYN AEO	SYN283412	SYN283412	
111	2014-02 Gross to Net LP.xlsx	SYN AEO	SYN283413	SYN283413	
112	2014-03 Gross to Net LP.xlsx	SYN AEO	SYN283414	SYN283414	
113	2014-04 Gross to Net LP.xlsx	SYN AEO	SYN283415	SYN283415	
114	2014-05 Gross to Net LP.xlsx	SYN AEO	SYN283416	SYN283416	

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
115	2014-06 Gross to Net LP.xlsx	SYN AEO	SYN283417	SYN283417	
116	2014-07 Gross to Net LP.xlsx	SYN AEO	SYN283425	SYN283425	
117	2014-08 Gross to Net LP.xlsx	SYN AEO	SYN283426	SYN283426	
118	2014-09 Gross to Net LP.xlsx	SYN AEO	SYN283427	SYN283427	
119	2014-10 Gross to Net Report.xlsx	SYN AEO	SYN283428	SYN283428	
120	2014-11 Gross to Net Report.xlsx	SYN AEO	SYN283429	SYN283429	
121	2014-12 Gross to Net Report.xlsx	SYN AEO	SYN283430	SYN283430	
122	Weekly Net Sales (\$) by Syngenta Product, Active Ingredient for Fungicides & Insecticides Wk 1 2014 - Wk 52 2015	SYN AEO	SYN283431	SYN283431	
123	2015-01 Gross to Net Report.xlsx	SYN AEO	SYN283434	SYN283434	
124	2015-01-13 AFRAME and AFRAME PLUS Positioning	SYN AEO	SYN283435	SYN283436	
125	2015-02 Gross to Net Report v3.xlsx	SYN AEO	SYN283437	SYN283437	
126	2015-03 Gross to Net Report.xlsx	SYN AEO	SYN283438	SYN283438	
127	2015-04 Gross to Net Report.xlsx	SYN AEO	SYN283440	SYN283440	
128	Aframe Plus Allocation - CSC dated April 13, 2015	SYN AEO	SYN283441	SYN283462	
129	2015-05 Gross to Net Report.xlsx	SYN AEO	SYN283463	SYN283463	
130	2016 Pricing Guidance – US Fungicides, dated May 7, 2015	SYN AEO	SYN283464	SYN283490	

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
131	AZT Pricing Guidance dated May 11, 2015	SYN AEO	SYN283492	SYN283495	
132	2015-06 Gross to Net Report.xlsx	SYN AEO	SYN283496	SYN283496	
133	2015-07 Gross to Net Report.xlsx	SYN AEO	SYN283497	SYN283497	
134	2015-08 Gross to Net Report.xlsx	SYN AEO	SYN283498	SYN283498	
135	2015-09 Gross to Net Report.xlsx	SYN AEO	SYN283499	SYN283499	
136	2015-10 Gross to Net Report.xlsx	SYN AEO	SYN283500	SYN283500	
137	2015-11 Gross to Net Report.xlsx	SYN AEO	SYN283501	SYN283501	
138	2015-12 Gross to Net Report.xlsx	SYN AEO	SYN283502	SYN283502	
139	2015-2019 Azoxystrobin Product Marketing Plan	SYN AEO	SYN283512	SYN283573	
140	2016-01 Gross to Net Report.xlsx	SYN AEO	SYN283574	SYN283574	
141	Azoxystrobin Tech. 2016 - 2021 US Product Marketing Plan RMC, dated November 25, 2015	SYN AEO	SYN283732	SYN283798	
142	Azoxystrobin_Imports_DEC_2015.xlsx	SYN AEO	SYN283800	SYN283800	
143	Annual Budgeted & Actual US Azoxy Sales and Gross Profit by Product Line (\$) 2009-2016	SYN AEO	SYN283802	SYN283802	
144	Annual Budgeted & Actual Azoxystrobin Sales and Gross Profit 2009-2016	SYN AEO	SYN283803	SYN283803	
145	Monthly US Sales by Product Line Jan 2013 - Dec 2015	SYN AEO	SYN283804	SYN283804	

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
146	2013 Gross to Net_0211.xlsx	SYN AEO	SYN283805	SYN283805	
147	Gross to Net June YTD 2016.xlsx	SYN AEO	SYN287759	SYN287759	
148	Gross to Net June LP	SYN AEO	SYN287760	SYN287760	
149	Book5.xlsx (2012 - 2015 NA Functional Costs)	SYN AEO	SYN287817	SYN287817	
150	Gross to Net 2012 - 2013 BUD.xlsx	SYN AEO	SYN287818	SYN287818	
151	Willowood Azoxy 2SC Sales Summary, December 8, 2015 through June 21, 2016	SYN AEO	WW026277	WW026279	
152	Willowood AzoxyProp Xtra Sales Summary, December 8, 2015 through June 21, 2016	SYN AEO	WW026280	WW026282	
153	Willowood Paid Rebates Summary by Year and Customer, 2014-2016	SYN AEO	WW026692	WW026692	
154	Summary of vendor invoices to W-USA for azoxystrobin technical and end-use formulation	WW AEO	WW000027	WW000027	
155	Vendor Invoices to W-USA for azoxystrobin technical and end-use formulation	WW AEO	WW000028	WW000056	
156	Summary of customer invoices for sale of AzoxyProp Xtra	WW AEO	WW000056	WW000060	
157	Customer invoices for sale of AzoxyProp Xtra	WW AEO	WW000061	WW000125	
158	Summary of customer invoices for sale of Azoxy 2SC	WW AEO	WW000126	WW000133	
159	Customer invoices for sale of Azoxy 2SC	WW AEO	WW000134	WW000210	
160	Willowood Sales Invoices of Azoxy 2SC, April 4, 2014 through June 13, 2016	WW AEO	WW026509	WW026553	

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
161	Willowood Sales Invoices of Azoxy 2SC, December 17, 2015 through April 13, 2016	WW AEO	WW026554	WW026597	
162	Willowood Sales Invoices of Azoxy 2SC, December 18, 2015 through March 31, 2016	WW AEO	WW026598	WW026623	
163	Willowood Sales Invoices of AzoxyProp Xtra, April 5, 2016 through April 29, 2016	WW AEO	WW026624	WW026653	
164	Willowood Sales Invoices of AzoxyProp Xtra, May 2, 2016 through June 13, 2016	WW AEO	WW026654	WW026686	
165	Willowood Sales Invoices of Azoxy Technical to Innvictus, dated April 24, 2015 and December 25, 2015	WW AEO	WW026687	WW026688	
166	Willowood Sales Summary & Invoices of Tebustrobin SC to AgXplore II, dated July 18, 2016 and July 20, 2016	WW AEO	WW026689	WW026691	
167	Email from M. James to M. Heinze re Willowood USA Product Price Guide	WW AEO	WW014446	WW014448	Heinze 45
168	Email from C. Houchin to M. Heinze re Willowood USA Product Price Guide and upcoming 2014 products	WW AEO	WW014445	WW014445	Heinze 46
169	Email from D. Miller to M. Heinze re Willowood USA meeting to discuss Propanil, Lambda and Azoxy volumes	WW AEO	WW014384	WW014384	Heinze 47
170	Compilation of Bill of Lading forms and purchase orders to Reichman Sales & Service, Inc.	WW AEO	REI00000046	REI00000062	Heinze 49
171	Email from B. Heinze to A. King et al. re Aframe Plus as Syngenta's new brand	WW AEO	REI00000036	REI00000037	Heinze 50
172	Email from B. Heinze to J. Middione re Azoxy; XS Ag pricing	WW AEO	WW010133	WW010136	Heinze 51
173	Email from B. Heinze to J. Middione et al. re Azoxystrobin pricing and discrepancies	WW AEO	WW010721	WW010722	Heinze 52

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
174	Email from J. Middione to P. Menagh et al. re price sheet, enclosing Willowood USA 2015 Distributor Price List	WW AEO	WW013662	WW013666	Heinze 53
175	Email from A. King to B. Heinze et al. re AzoxyProp pricing; miscommunication	WW AEO	WW010305	WW010309	Heinze 54
176	Email from J. Middione to B. Heinze et al. re AzoxyProp pricing; miscommunication	WW AEO	WW010287	WW010289	Heinze 55
177	Email from B. Heinze to C. Daniels et al. re Innv Azoxy Prop; miscommunication	WW AEO	WW011148	WW011151	Heinze 56
178	Email from M. Heinze to D. Mathis et al., enclosing Reichman Ag Products sales order	WW AEO	WW014534	WW014536	Heinze 57
179	Email from B. Heinze to A. King re product distribution	WW AEO	WW013429	WW013431	Heinze 60
180	Email from J. Middione to A. King et al. enclosing 2015 Azoxy pricing matrix	WW AEO	WW008596	WW008596	Middione 20
181	Email from J. Middione to B. Heinze et al. re AzoxyProp pricing	WW AEO	WW010357	WW010359	Middione 22
182	Email from J. Middione to C. Daniel re AzoxyProp pricing	WW AEO	WW010692	WW010696	Middione 23
183	Email from J. Middione to C. Daniel et al. re AzoxyProp Xtra - T H Agrichemicals	WW AEO	WW010576	WW010577	Middione 25
184	Email from A. King to B. Reichman et al. re Azoxy competitive pricing, enclosing 2015 Reichman Sales & Service, Inc. Azoxy pricing	WW AEO	WW008583	WW008584	Middione 27
185	Email from J. Middione to B. Heinze et al. re Azoxy 2SL; customer price changes	WW AEO	WW009898	WW009901	Middione 28
186	Email from J. Middione to A. King et al. forwarding emails detailing net pricing; miscommunication	WW AEO	WW008789	WW008793	Middione 29
187	Email from B. Heinze to J. Middione et al. re Tremont Azoxy issue	WW AEO	WW021221	WW021225	Middione 30

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
188	Willowood Azoxy 2SC - United Turf Alliance (UTA) Proposal	WW AEO	WW012046	WW012046	Middione 31
189	2/15/2015 A. King Email to B. Reichman re product pricing and discount	Not Confidential	REI00000027	REI00000027	
190	12/10/2014 A. King Email to B. Reichman re Syngenta pricing	Not Confidential	REI00000030	REI00000035	
191	10/20/2014 B. Heinze Email to B. Reichman re Syngenta Fighting Brands	Not Confidential	REI00000036	REI00000037	
192	Reichman purchase orders and sales records for Willowood azoxystrobin products	Not Confidential	REI00000046	REI00000062	Reichman 09
193	Letter from H. Santhanam to X. Wu re date of oral deposition	Not Confidential			Wu 2ds
194	Letter from S. Tiller to X. Wu re documents requested of Yangcheng TaiHe Chemicals Co., Ltd.	Not Confidential			Wu 4ds
195	Email from B. Neuman to P. Davis enclosing Azoxystrobin opinion	WW AEO	WW026378	WW026380	Hayden 09
196	Letter from C. Hayden to B. Heinze re Freedom to Operate opinion and Analysis of U.S. Patent Nos. 5,847,138, 5,760,250, and 5,602,076, each relating to Azoxystrobin formulations	WW AEO	WW026381	WW026397	Hayden 11
197	Email from B. Heinze to C. Hayden et al. re opinion letters for Azoxystrobin	WW AEO	WW026327	WW026331	Hayden 13
198	Letter from C. Hayden to B. Heinze re Freedom to Operate Opinion and Analysis of U.S. Patent No. 5,847,138 relating to Azoxystrobin formulations	WW AEO	WW026223	WW026237	Hayden 14

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
199	Letter from C. Hayden to B. Heinze re Update on Freedom to Operate Opinion and Analysis of U.S. Patent No. 5,847,138 relating to Azoxystrobin formulations	WW AEO	WW026255	WW026273	Hayden 19
200	Email from R. Wichert to M. Hennen et al. re Post Patent Strategy Session on TMX, enclosing an overview of Syngenta's Post Patent Strategy Guide	SYN AEO	SYN 162092	SYN 162162	Cecil 02
201	Email from R. Wichert to C. Clear, forwarding email from C. Garman, enclosing updated AI redemption calculator (Non-bates numbered attachments following email)	SYN AEO	SYN 162737	SYN 162737	Cecil 03
202	2015-2016 Syngenta Crop Protection - Distributor Service and Support Program	SYN AEO	SYN 035518	SYN 035525	Cecil 04
203	2015-2016 Syngenta Crop Protection and Seedcare - Retail Program & Policy Guide	SYN AEO	SYN 035476	SYN 035487	Cecil 05
204	Email from R. Wichert to J. Cecil et al. enclosing updated Post Patent Working Group Competitive Activity	SYN AEO	SYN 163288	SYN 163294	Cecil 06
205	Email from R. Wichert to J. Cecil forwarding email re high level summary of post patent activities, enclosing document re same	SYN AEO	SYN 163517	SYN 163519	Cecil 07
206	Email from B. Reeve to R. Wichert et al. re update on generic registrations, enclosing PPD USA	SYN AEO	SYN 175131	SYN 175146	Cecil 08
207	Email from J. Barnes to employees re new business opportunity; NA Development Committee Communication: Quadris(r) Top SC Formulation to North America - Release to First Sale	SYN AEO	SYN 180814	SYN 180816	Cecil 09
208	Overview of AZT Post Patent Interactions	SYN AEO	SYN 267699	SYN 267699	Cecil 10

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
209	Email from T. Affonso to several global territories, enclosing Bi-Monthly Report - January 2015 Distribution	SYN AEO	SYN 271386	SYN 271466	Cecil 11
210	Solatenol New Product Introduction 2013-2015, Regional Marketing Committee November 2014	SYN AEO	SYN 271855	SYN 271872	Cecil 12
211	Email from C. Lippuner to S. Dale et al. enclosing Solatenol North America Launch Update	SYN AEO	SYN 271932	SYN 271954	Cecil 13
212	Aframe March Price Positioning	SYN AEO	SYN 272006	SYN 272007	Cecil 14
213	Email from A. Fisher to C. Lippuner et al. enclosing Azoxystrobin generic February 2015 update	SYN AEO	SYN 272081	SYN 272083	Cecil 15
214	Email from A. Fisher to J. Cecil et al. re Syngenta's First Amendment to the Azoxystrobin Millbase (AM) Supply Agreement	SYN AEO	SYN 134640	SYN 134642	Cecil 16
215	Email from L. Sandlin to V. Hawkins et al. re 2015 Stratus Potato Fungicide Study, enclosing Brand Focus360 Potato Fungicides USA 2015	SYN AEO	SYN 158704	SYN 158802	Cecil 17
216	2015 Syngenta Key AI - Commentary	SYN AEO	SYN 058829	SYN 058829	Cecil 18
217	Fungicide Price Monitoring July 7 Update (Farmgate Pricing)	SYN AEO	SYN 056268	SYN 056269	Cecil 19
218	US Fungicides Market Share Summary - Syngenta/BASF/Bayer	SYN AEO	SYN 037102	SYN 037114	Cecil 21
219	Territory Portfolio Review - Strategic Market Sectors - U.S. Corn Fungicides	SYN AEO	SYN 055478	SYN 055491	Cecil 22
220	2015 AgroTrak Report for Corn, Soy, Cereals, Herbicides, Insecticides & Fungicides	SYN AEO	SYN 064435	SYN 064458	Cecil 24

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
221	Letter from C. Flippin to Syngenta Distributors, enclosing Distributor Price Schedule	SYN AEO			Cecil 25
222	AZ Fungicide 2016 Pricing - Industry, Customer and Market Dynamics	SYN AEO	SYN 056234	SYN 056244	Cecil 26
223	Pre-GSOP November 2014 Info Pack	SYN AEO	SYN 271712	SYN 271809	Fisher 01
224	Handwritten note stating electronic spreadsheet was retained by Mr. Tiller and that he would email to other attorneys.	SYN AEO			Fisher 04
225	Aframe/Aframe Plus AZT Fighting Brand	SYN AEO	SYN 283575	SYN 283586	Fisher 07
226	Territory Portfolio Review - Strategic Market Sectors - U.S. Corn Fungicides	SYN AEO	SYN 055478	SYN 055487	Fisher 14
227	US Fungicides Strategy Outlook	SYN AEO	SYN 055446	SYN 055471	Fisher 15
228	Life Cycle Management at Syngenta	SYN AEO	SYN 027038	SYN 027050	Fisher 16
229	Email from R. Rezaaiyan to J. Abbott et al. forwarding S. Schaible email re Azoxy generic registrations relying on Syngenta as a source	SYN AEO	SYN 287726	SYN 287727	Wichert 02
230	Combined Output: Azoxy Post Patent Strategy	SYN AEO	SYN 272305	SYN 272325	Wichert 03
231	North America 2016 Pricing Strategy	SYN AEO	SYN 272619	SYN 272640	Wichert 04
232	Email from R. Wichert re Supply Agreement	SYN AEO	SYN 161621	SYN 161636	Wichert 08
233	First Amendment to the Supply Agreement	SYN AEO	SYN 010204	SYN 010223	Wichert 10
234	Azoxystrobin Millibase (AM) Supply Agreement	SYN AEO	SYN 060015	SYN 058306	Wichert 11
235	Row Crop Fungicides Price Monitoring	SYN AEO	SYN 055582	SYN 055583	Wichert 22
236	Aframe (Quadris Fighting Brand) Aframe Plus (Quilt Xcel Fighting Brand)	SYN AEO	SYN 037375	SYN 037381	Wichert 23

Ex. No.	Description	Confidentiality Designation ³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No. ⁴
237	Syngenta Azoxystrobin Post-Patent Defense Strategy	SYN AEO	SYN 038188	SYN 038197	Wichert 24
238	Zeneca Fine Chemicals Manufacturing Organisation, Grangemouth Works - Process Technology Department Technical Memorandum - Evaluation of an Alternative Route: Introduction of the Methoxyacrylate Group at the Last Stage	SYN AEO	SYN 292658	SYN 292741	Fortunak 13
239	Andrew Noel & Jack Kaskey, FMC Buys Cheminova for \$1.8 Billion and Revises Breakup Bloomberg News (September 8, 2014), https://www.bloomberg.com/news/articles/2014-09-08/fmc-to-buy-cheminova-for-1-8-billion-as-ceo-modifies-strategy (last visited May 1, 2017)	Not Confidential			Dkt. 164-31
240	Willowood USA, Azoxy 2SC, http://www.willowoodusa.com/products/fungicides/azoxy-2sc/ (last visited May 1, 2017)	Not Confidential			Dkt. 164-32
241	Willowood USA, AzoxyProp Xtra, http://www.willowoodusa.com/products/fungicides/azoxyprop-xtra/ (last visited May 1, 2017)	Not Confidential			Dkt. 164-33
242	Christina D. Romer, the Aftermath of Financial Crises: Each Time Really Is Different, Sir John Hicks Lecture in Economic History (Oxford Univ. Apr. 28, 2015), <i>available at</i> http://eml.berkeley.edu/~cromer/Lectures/Romer%20Hicks%20Lecture%20Written	Not Confidential			Dkt. 164-34

Ex. No.	Description	Confidentiality Designation ³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No. ⁴
	%20Version.pdf (last visited May 1, 2017)				
243	National Crop Insurance Services, 49 CROP INSURANCE TODAY 2 (May 2016), available at http://www.brightcopy.net/allen/cint/may2016/index.php#/0 (last visited May 1, 2017)	Not Confidential			Dkt. 164-35
244	Chemicool, Definition of chromatography , available at http://www.chemicool.com/definition/chromatography.html .	Not Confidential			
245	Chemicool, Definition of High-performance liquid chromatography (HPLC) , available at http://www.chemicool.com/definition/high_performance_liquid_chromatography_hplc.html	Not Confidential			
246	Private Pesticide Applicator Manual, Ch. 4, p. 85 (19th ed. 2012)	Not Confidential	SYN287826	SYN287849	
247	CRC Handbook	Not Confidential	SYN287850	SYN289277	
248	L.S. Ettre, Nomenclature for Chromatography, Pure & Appl. Chem., 65:819–872 (1993), available at https://iupac.org/publications/pac/1993/pdf/6504x0819.pdf	Not Confidential			
249	Willowood, LLC, Product Identity and Composition, Description of the Materials Used, Description of the Formulation Process, Discussion of the Formation of Impurities, Certified Limits, and Analytical Methods to Verify Certified Limits for Willowood	WW AEO	WW000307	WW000370	

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
	Azoxystrobin 2.08SC, Study No. WW-201309 (Aug. 13, 2013)				
250	Analytical & Regulatory Chemistry, Inc, Final Report for: Physical and Chemical Characteristics of Willowood AzoxyTeb SC, Report No. ARC-EX-1618-006-P-1	WW AEO	WW015444	WW015464	
251	2015 AgroTrak Report Corn, Soy, Cereals Herbicides, Insecticides & Fungicides, dated February 4, 2016	SYN AEO	SYN026718	SYN026740	
252	Email from Mark Wolters to Scott Langkamp, et al. on July 13, 2015	SYN AEO	SYN036816	SYN036816	
253	2016 Pricing Guidance – US Fungicides, dated April 22, 2015	SYN AEO	SYN037154	SYN037174	
254	Email from Don Carpino to Scott Langkamp on March 6, 2015	SYN AEO	SYN037471	SYN037473	
255	Email from Eric Larson to Rusty Harder, et al. on January 14, 2015	SYN AEO	SYN038212	SYN038213	
256	Email from Scott Tefteller to Corey Huck, et al. on November 19, 2014	SYN AEO	SYN038709	SYN038709	
257	Manufacturer List to Grower Price Flow and AZT U.S. Product Marketing Plan	SYN AEO	SYN056120	SYN056141	Cecil 20
258	Email from Mary Johnson to Bob Kacvinsky on July 20, 2015	SYN AEO	SYN056311	SYN056312	
259	Second Amendment to Supply Agreement	SYN AEO	SYN058305	SYN058306	
260	Email from Scott Langkamp to Andrew Fisher on November 18, 2015	SYN AEO	SYN058805	SYN058805	
261	Email from Matt Heinze to Bret Horner on July 08, 2015	SYN AEO	SYN059143	SYN059144	
262	March 2015 Pricing Detail by Product vs. Competitors	SYN AEO	SYN061003	SYN061003	

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
263	Aframe (Quadris Fighting Brand) and Aframe Plus (Quilt Xcel Fighting Brand)	SYN AEO	SYN061668	SYN061677	
264	Fungicide Competitive Update, BASF Headline Adjustment Generic Update, dated March 7, 2015	SYN AEO	SYN062113	SYN062122	
265	Email from Andrew Fisher to Jeff Cecil and Christian Lippuner on November 18, 2015	SYN AEO	SYN134640	SYN134642	
266	Syngenta Quadris Flowable Fungicide Label	SYN AEO	SYN279486	SYN279539	
267	Syngenta Quilt Xcel EPA Label	SYN AEO	SYN279541	SYN279569	
268	GMK Review dated January 13, 2016	SYN AEO	SYN283371	SYN283381	
269	Titan Pro Draft dated November 11, 2015	SYN AEO	SYN283391	SYN283411	
270	Azoxystrobin License, Supply and Data Access Agreement	SYN AEO	SYN284136	SYN284173	
271	Supply Agreement	SYN AEO	SYN284174	SYN284187	
272	Supply Agreement	SYN AEO	SYN284188	SYN284201	
273	First Amendment to Supply Agreement	SYN AEO	SYN284202	SYN284207	
274	Supply Agreement	SYN AEO	SYN284208	SYN284221	
275	Supply Agreement	SYN AEO	SYN284222	SYN284223	
276	First Amendment to Supply Agreement	SYN AEO	SYN284224	SYN284227	
277	Supply Agreement	SYN AEO	SYN284228	SYN284237	
278	Supply Agreement	SYN AEO	SYN284238	SYN284258	

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
279	Supply Agreement	SYN AEO	SYN284273	SYN284283	
280	License Agreement between Syngenta Limited and Syngenta Supply AG, executed on February 24, 2011	SYN AEO	SYN287740	SYN287755	
281	Amendment of the License Agreement between Syngenta Limited and Syngenta AG, executed on January 5, 2015	SYN AEO	SYN287756	SYN287757	
282	NA ICS / L&G Business Contribution.xlsx	SYN AEO	SYN287820	SYN287820	
283	United Turf Alliance ArmorTech Zoxy 2SC Label	Not Confidential	SYN289278	SYN289294	
284	United Turf Alliance ArmorTech Zoxy-T Label	Not Confidential	SYN289295	SYN289304	
285	United Turf Alliance ArmorTech Zoxy 2 SC EPA label	Not Confidential	SYN289305	SYN289315	
286	Albaugh ArmorTech Zoxy-T EPA label	Not Confidential	SYN289316	SYN289321	
287	Liberty Crop Protection Liberty 3 Way EPA label	Not Confidential	SYN289322	SYN289333	
288	Innvictis Crop Care Trevo EPA label	Not Confidential	SYN289334	SYN289369	
289	Safety Data Sheet for Innvictis Trevo	Not Confidential	SYN289370	SYN289374	
290	Innvictis Crop Care Trevo Prop EPA label	Not Confidential	SYN289375	SYN289394	
291	Syngenta Callisto EPA Label	Not Confidential	SYN289395	SYN289431	
292	Syngenta Zemax EPA Label	Not Confidential	SYN289432	SYN289459	
293	EPA Approval of Azoxy 2SC Label Amendment, dated February 8, 2016	Not Confidential	SYN289460	SYN289524	

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
294	EPA Registration Nos. 74054-7	Not Confidential	SYN289525	SYN289529	
295	EPA Registration Nos. 42750-261	Not Confidential	SYN289530	SYN289586	
296	EPA Registration Nos. 42750-262	Not Confidential	SYN289587	SYN289592	
297	EPA Registration Nos. 42750-284	Not Confidential	SYN289593	SYN289611	
298	EPA Registration Nos. 42750-285	Not Confidential	SYN289612	SYN289636	
299	EPA Registration Nos. 42750-289	Not Confidential	SYN289637	SYN289672	
300	EPA Registration Nos. 42750-290	Not Confidential	SYN289673	SYN289707	
301	EPA Registration Nos. 42750-291	Not Confidential	SYN289708	SYN289721	
302	EPA Registration Nos. 42750-292	Not Confidential	SYN289722	SYN289734	
303	EPA Registration Nos. 42750-297	Not Confidential	SYN289735	SYN289740	
304	EPA Registration Nos. 264-770	Not Confidential	SYN289741	SYN289747	
305	EPA Registration Nos. 279-3442	Not Confidential	SYN289973	SYN289994	
306	EPA Registration Nos. 4787-65	Not Confidential	SYN289995	SYN290001	
307	EPA Registration Nos. 67760-124	Not Confidential	SYN290002	SYN290062	
308	EPA Registration Nos. 67760-130	Not Confidential	SYN290063	SYN290097	
309	EPA Registration Nos. 81964-5	Not Confidential	SYN290098	SYN290102	

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
310	EPA Registration Nos. 53883-343	Not Confidential	SYN290103	SYN290133	
311	EPA Registration Nos. 53883-358	Not Confidential	SYN290134	SYN290146	
312	EPA Registration Nos. 352-840	Not Confidential	SYN290156	SYN290168	
313	EPA Registration Nos. 10163-332	Not Confidential	SYN290169	SYN290185	
314	EPA Registration Nos. 89966-2	Not Confidential	SYN290186	SYN290190	
315	EPA Registration Nos. 71532-34	Not Confidential	SYN290191	SYN290199	
316	EPA Registration Nos. 71532-35	Not Confidential	SYN290200	SYN290270	
317	EPA Registration Nos. 34704-934	Not Confidential	SYN290271	SYN290289	
318	EPA Registration Nos. 34704-1068	Not Confidential	SYN290290	SYN290340	
319	EPA Registration Nos. 66222-250	Not Confidential	SYN290341	SYN290366	
320	EPA Registration Nos. 35935-101	Not Confidential	SYN290367	SYN290372	
321	EPA Registration Nos. 228-720	Not Confidential	SYN290373	SYN290423	
322	EPA Registration Nos. 228-721	Not Confidential	SYN290424	SYN290494	
323	EPA Registration Nos. 228-722	Not Confidential	SYN290495	SYN290529	
324	EPA Registration Nos. 228-724	Not Confidential	SYN290530	SYN290555	
325	EPA Registration Nos. 55146-147	Not Confidential	SYN290556	SYN290572	

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
326	EPA Registration Nos. 55146-149	Not Confidential	SYN290573	SYN290578	
327	EPA Registration Nos. 55146-150	Not Confidential	SYN290579	SYN290584	
328	EPA Registration Nos. 83529-49	Not Confidential	SYN290585	SYN290614	
329	EPA Registration Nos. 60063-57	Not Confidential	SYN290615	SYN290634	
330	EPA Registration Nos. 100-1140	Not Confidential	SYN290651	SYN290655	
331	EPA Registration Nos. 100-1161	Not Confidential	SYN290656	SYN290695	
332	EPA Registration Nos. 100-1324	Not Confidential	SYN290696	SYN290748	
333	EPA Registration Nos. 100-1466	Not Confidential	SYN290749	SYN290790	
334	EPA Registration Nos. 100-1480	Not Confidential	SYN290791	SYN290829	
335	EPA Registration Nos. 100-1098	Not Confidential	SYN290830	SYN290873	
336	EPA Registration Nos. 100-1178	Not Confidential	SYN290874	SYN290895	
337	EPA Registration Nos. 100-1471	Not Confidential	SYN290896	SYN290935	
338	EPA Registration Nos. 33270-32	Not Confidential	SYN290936	SYN290992	
339	EPA Registration Nos. 89118-3	Not Confidential	SYN290993	SYN291060	
340	EPA Registration Nos. 87290-44	Not Confidential	SYN291126	SYN291184	
341	EPA Registration Nos. 87290-56	Not Confidential	SYN291185	SYN291217	

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
342	EPA Registration Nos. 67760-129	Not Confidential	SYN291255	SYN291270	
343	Jackson, Daniel L. and Kedrowski, Kathleen M. "Calculating Intellectual Property Infringement Damages," AICPA, 2013	Not Confidential	SYN289748	SYN289897	
344	Pollack, Richard A., Scott M. Bouchner, Craig M. Enos, Colin A. Johns and John D. Moyl "Calculating Lost Profits" AICPA, 2006	Not Confidential	SYN289898	SYN289972	
345	Rogers, Everett M. Diffusion of Innovations, 5th Edition, 2003	Not Confidential	SYN290147	SYN290155	
346	Willowood Azoxy 2SC Label (Revised May 4, 2015)	Not Confidential	WW012129	WW012183	
347	Willowood Tebustrobin SC Label (Revised Oct. 20, 2015)	Not Confidential	WW015914	WW015932	
348	Pyxis Regulatory Consulting Letter to EPA re: Willowood AzoxyProp Xtra Submission of a Non-PRIA Fast Track Label Amendment, dated May 21, 2015	WW AEO	WW018540	WW018623	
349	Greenfields Azoxystrobin Technical Registration	WW AEO	WW018965	WW018969	
350	Email from Joseph Middione to Brian Heinze on March 26, 2014	WW AEO	WW020109	WW020117	
351	Willowood AzoxyProp Xtra Label (Revised Dec. 18, 2015)	WW AEO	WW020944	WW020971	
352	EPA Letter to Pyxis Regulatory Consulting re: Label Amendment for Willowood AzoxyProp Xtra, dated December 10, 2015	WW AEO	WW021447	WW021483	
353	Azoxystrobin Product Profile (www.agribusinessglobal.com/agrichemicals/fungicides/product-profile-azoxystrobin/)	Not Confidential			

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
354	EPA's response re: Petition for Extension of the Exclusive Use Data Protection Period for Mesotrione (EPA Reg. No. 100-1140) to June 4, 2014 (www.epa.gov/sites/production/files/2014-04/documents/mesotrione-response.pdf)	Not Confidential			
355	http://ag.wilburellis.com/Products/Pages/Home.aspx	Not Confidential			
356	http://albaughllc.com/company/	Not Confidential			
357	http://lanxess.us/en/lanxess-in-the-usa/	Not Confidential			
358	http://news.agropages.com/News/NewsDetail--7112.htm	Not Confidential			
359	http://npirspublic.ceris.purdue.edu/ppis/Default.aspx	Not Confidential			
360	http://researchinformation.Co.Uk/pest/2001/B106300F.PDF	Not Confidential			
361	http://researchinformation.Co.Uk/Pest/2001/B106300F.Pdf	Not Confidential			
362	http://vivecrop.com/products/	Not Confidential			
363	http://www.agprofessional.com/news/Chemino-va-launches-Azaka-and-Equation-fungicides-for-US--259126991.html	Not Confidential			
364	http://www.agribusinessglobal.com/uncategorized/product-profile-mesotrione/	Not Confidential			
365	http://www.bloomberg.com/profiles/companies/0132004D:US-gowan-co-llc	Not Confidential			
366	http://www.bloomberg.com/research/stocks/private/snapshot.asp?privcapId=117472488	Not Confidential			

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
367	http://www.bloomberg.com/research/stocks/private/snapshot.asp?privcapId=118748243	Not Confidential			
368	http://www.bloomberg.com/research/stocks/private/snapshot.asp?privcapId=2732461	Not Confidential			
369	http://www.bloomberg.com/research/stocks/private/snapshot.asp?privcapId=41315534	Not Confidential			
370	http://www.bloomberg.com/research/stocks/private/snapshot.asp?privcapId=4321020	Not Confidential			
371	http://www.bloomberg.com/research/stocks/private/snapshot.asp?privcapId=4583604	Not Confidential			
372	http://www.controlsolutionsinc.com/	Not Confidential			
373	http://www.copyright.gov/title17/92chap5.html#504	Not Confidential			
374	https://web.archive.org/web/20150524041431/http://www.dupont.com/content/dam/assets/industries/agriculture/assets/cp_PSD-95_K-27702-1.pdf	Not Confidential			
375	http://www.ers.usda.gov/data-products/farm-income-and-wealth-statistics/net-cash-income.aspx	Not Confidential			
376	http://www.fmccrop.com/grower/Products/Fungicides.aspx	Not Confidential			
377	http://www.gfagrochem.com/aboutus-e.html	Not Confidential			
378	http://www.helenachemical.com/about-us/	Not Confidential			
379	https://web.archive.org/web/20160303185130/http://www.lgls.com/about/company/business/chemistry.jsp	Not Confidential			

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
380	http://www.lgls.com/chemistry/prod/product_view.jsp?ke_gubun=EN&group_code=10&mcat egory_seq=18	Not Confidential			
381	http://www.mfa-inc.com/AboutUs.aspx	Not Confidential			
382	https://web.archive.org/web/20160317200148/http://www.nordersupply.com/images/e0187101/about.htm	Not Confidential			
383	http://www.nufarm.com/US/AboutUs	Not Confidential			
384	http://www.pinnacleagholdings.com/company/about	Not Confidential			
385	http://www.prnewswire.com/news-releases/makhteshim-agan-to-re-brand-global-business-as-adama-242342531.html	Not Confidential			
386	http://www.prnewswire.com/news-releases/syngenta-receives-epa-registration-for-breakthrough-fungicide-solatenol-300135791.html	Not Confidential			
387	http://www.shardausa.com/about	Not Confidential			
388	http://www.syngentacropprotection.com	Not Confidential			
389	https://web.archive.org/web/20160529232723/http://www.syngentacropprotection.com/elatus?tab=details-(solatenol-fungicide-+-azo)-fungicide	Not Confidential			
390	http://www.syngentacropprotection.com/trivapro-fungicide	Not Confidential			
391	http://www.syngentaprofessionalproducts.com/ppmain.aspx	Not Confidential			

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
392	http://www.syngenta-us.com/crops	Not Confidential			
393	http://www.syngenta-us.com/labels/about-flowable	Not Confidential			
394	http://www.syngenta-us.com/labels/callisto	Not Confidential			
395	http://www.syngenta-us.com/labels/quadris	Not Confidential			
396	http://www.syngenta-us.com/labels/quilt	Not Confidential			
397	http://www.syngenta-us.com/labels/trivapro	Not Confidential			
398	http://www.syngenta-us.com/labels/zemax	Not Confidential			
399	http://www.tide-china.com/en/About.aspx?id=1	Not Confidential			
400	http://www.willowoodusa.com/products/fungicides/azoxy-2sc/	Not Confidential			
401	http://www.willowoodusa.com/products/fungicides/azoxyp-xtra/	Not Confidential			
402	http://www4.syngenta.com/investors/investors-faq	Not Confidential			
403	https://iaspub.epa.gov/apex/pesticides/f?p=PPLS:1	Not Confidential			
404	https://www.dmreztrak.com/default.aspx	Not Confidential			
405	https://www.nass.usda.gov/Charts_and_Maps/graphics/data/pricecn.txt	Not Confidential			
406	https://www.nass.usda.gov/Charts_and_Maps/graphics/data/pricesb.txt	Not Confidential			
407	https://www.nass.usda.gov/Charts_and_Maps/graphics/data/pricewh.txt	Not Confidential			

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
408	https://www.pwc.com/gx/en/international-transfer-pricing/assets/itp-2013-final.pdf	Not Confidential			
409	Jasco Analytical Instruments, LC-4000 Series Integrated HPLC and UHPLC System, available at http://www.jascoinc.com/chromatography/hplc-systems	Not Confidential			
410	January 19, 2016 Willowood's Response to Syngenta's First Set of Interrogatories	Not Confidential			
411	July 14, 2016 Willowood's Response to Syngenta's Fourth Set of Interrogatories	Not Confidential			
412	June 2, 2016 Willowood's Response to Syngenta's Third Set of Interrogatories				
413	NuFarm Annual Report 2015 (http://www.nufarm.com/Assets/31936/1/NufarmAR2015.pdf)	Not Confidential			
414	Producer Price Index by Industry: Pesticide and Other Agricultural Chemical Manufacturing: Agricultural and Commercial Pesticides and Chemicals (fred.stlouisfed.org/series/PCU3253203253201)	Not Confidential			
415	QUADRIS Early Info Sheet (www.syngentacropprotection.com/quadrifungicide?tab=details)	Not Confidential			
416	QUILT XCEL Competitor Sheet (www.syngentacropprotection.com/quilt-xcel-fungicide?tab=details)	Not Confidential			
417	SEMATECH Provisional Test Method for Determining Leachable Trace Inorganics in UPW Distribution System Components,	Not Confidential			

Ex. No.	Description	Confidentiality Designation ³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No. ⁴
	available at http://www.sematech.org/docubase/document/0936bstd.pdf				
418	Sigma-Aldrich, Product Specification for 1,4-diazabicyclo[2.2.2]octane, available at http://www.sigmaaldrich.com/Graphics/COFAIinfo/SigmaSAPQM/SPEC/D2/D27802/D27802-BULK_____SIAL_____.pdf	Not Confidential			
419	Syngenta AG Form 20-F, dated February 11, 2016 (: http://www4.syngenta.com/~media/Files/S/Syngenta/documents/2015-form-20-f.pdf)	Not Confidential			
420	Data Compensation Consulting Agreement between Greenfields Marketing, Ltd. and Willowood USA, LLC	WW AEO	WW026274	WW026276	Heinze 70
421	[Intentionally Omitted]				
422	Albaugh, LLC, Sales by Item, February 16, 2015 through March 23, 2016	3rd Party AEO	ALB 000001	ALB 000005	
423	Crop Production Services, Inc. Purchase Data (Unit Price, Gross Sales, Rebate) Sales by Invoice, Date, Item, and Branch Mar 2013-Jun 2016	3rd Party AEO	CPS000001	CPS000001	
424	Cheminova Azoxystrobin Technical EPA Registration	3rd Party AEO	FMC00000001	FMC0000710	
425	Cheminova Produced: Quantity (Gal) and Gross Revenue by Product 2014-2015	3rd Party AEO	FMC00000713	FMC00000715	
426	Monthly Sales of Affiance from May 2014 through June 2016	3rd Party AEO	GOW-000001	GOW-000004	

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
427	Willowood Top 10 Customers by Product January 2010 through September 2015	3rd Party AEO	LARIAT00003444	LARIAT00003445	
428	Willowood USA, LLC Profit & Loss January 2013 through May 2015	3rd Party AEO	LARIAT00004282	LARIAT00004285	
429	Willowood USA Points of Interest	3rd Party AEO	LARIAT00004341	LARIAT00004343	
430	Product Portfolio Financial Summary - Azoxy 2.08SC & AzoxyProp Xtra	3rd Party AEO	LARIAT00011266	LARIAT00011269	
431	Top 10 Product Portfolio Financial Summary	3rd Party AEO	LARIAT0001160	LARIAT0001161	
432	Monthly Sales, COGS, Margin, Volume, Avg \$ - Azoxy 2SC & AzoxyProp Xtra Jan 2014 - Dec 2014	3rd Party AEO	LARIAT00012925	LARIAT00012925	
433	Monthly Sales, COGS, Margin, Volume, Avg \$ - Azoxy 2SC & AzoxyProp Xtra Jan 2015 - Dec 2015	3rd Party AEO	LARIAT00013138	LARIAT00013138	
434	Monthly Sales, COGS, Margin, Volume, Avg \$ - Azoxy 2SC & AzoxyProp Xtra Jan-14 - May-16	3rd Party AEO	LARIAT00013374	LARIAT00013374	
435	Amended and Restated Limited Liability Corporation Agreement of Willowood USA Holdings, LLC dated April 20, 2016	3rd Party AEO	LARIAT00000006	LARIAT00000090	
436	AIG Specialty Insurance Co. Binder Agreement	3rd Party AEO	LARIAT00000091	LARIAT00000122	
437	Compilation of Willowood USA, LLC Schedules, Profit & Loss Statements, Balance Sheets and Loss Detail Reports	3rd Party AEO	LARIAT00000123	LARIAT00000184	
438	Indemnification and Contribution Agreement dated April 20, 2016	3rd Party AEO	LARIAT00000243	LARIAT00000250	

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
439	Management Agreement between Lariat Partners LP and Willowood USA, LLC dated April 20, 2016	3rd Party AEO	LARIAT00000255	LARIAT00000261	
440	Escrow Agreement between Willowood USA Holdings, LLC and Vijay Mundhra dated April 20, 2016	3rd Party AEO	LARIAT00000262	LARIAT00000285	
441	Unit Purchase Agreement between Willowood USA Holdings, LLC and Vijay Mundhra dated April 20, 2016	3rd Party AEO	LARIAT00000316	LARIAT00000393	
442	Limited Liability Corporation Agreement of Blue Dream Acquisition, LLC dated April 18, 2016	3rd Party AEO	LARIAT00000851	LARIAT00000900	
443	Blue Dream Acquisition, LLC Written Consent Action of the Initial Manager in Lieu of Organizational Meeting dated April 18, 2016	3rd Party AEO	LARIAT00000901	LARIAT00000949	
444	Amended and Restated Limited Liability Corporation Agreement of Willowood USA Holdings, LLC dated April 20, 2016	3rd Party AEO	LARIAT00001069	LARIAT00001153	
445	Loveland Sales by Invoice for Satori (2x2 5 GAL) from March 5, 2013 through May 24, 2016	3rd Party AEO	LPI0000001	LPI0000001	
446	Innvictis Sales of Azoxystrobin (Qty, Price, \$) by Date and Customer Name 2012-2016	3rd Party AEO	PINN 0001	PINN 0663	
447	Reichman Produced: Sales data for Syngenta, Willowood, Cheminova, and Albaugh products 2014-2015	3rd Party AEO	REI000000001	REI000000122	
448	Sales by Invoice of Azoxy 2SC and AzoxyProp Xtra at AgraCity for 2014 and 2015	3rd Party AEO	TPS000000005	TPS000000005	

Ex. No.	Description	Confidentiality Designation³	Begin Bates	End Bates	Deposition Ex. No. / Dkt. No.⁴
449	Sales by Invoice of the Product Custodia for 2014 and 2015	3rd Party AEO	TPS00000820	TPS00000821	
450	Exhibit A to Lambert Declaration: Defendant's First Supplemental Non-Infringement Contention and Invalidity Contentions dated June 21, 2016	3rd Party AEO	TPS00001550	TPS00001581	
451	Azoxystrobin Sales Invoice Listing from October 2010 through April 2016	3rd Party AEO	USI00000294	USI00000360	
452	Winfield Produced: Gross Sales and Net Sales by Year, Product, Invoice Units (Oz), Customer, and Shipping Location 2009, 2010, 2014	3rd Party AEO	WIN 000001	WIN 000011	
453	Winfield Produced: Gross Sales and Net Sales by Year, Product, Invoice Units (Oz) 1/4/10-9/30/16	3rd Party AEO	WIN 000012	WIN 000012	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document has been filed electronically with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record in this action.

This the 1st day of June, 2017.

/s/ Richard A Coughlin
Richard A. Coughlin